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MEMO ENDORSED

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October 23, 2024

VIA ECF

Hon. Valerie E. Caproni
United States District Court Judge
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 443
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 10/24/2024

Re: *Ramirez v. M.L Restaurant Corp.*, CA No. 14-cv-04030

Dear Judge Caproni:

This firm represents the defendants M. L. Restaurant Corp. and Manuel Liberato (collectively "Defendants") in the above referenced matter. We write to respectfully request the Court's interference in this matter given that the plaintiffs have refused to sign off on the Satisfaction of Judgment for this case.

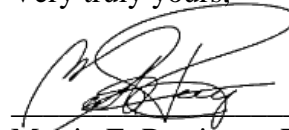
To be clear, in April of this year Defendants made the final payment contemplated by the settlement agreement entered in this action. As a result, Defendants have no more obligations to the plaintiffs. Nevertheless, plaintiffs continue to maintain a lien on Defendants' assets, including Mr. Liberato's home.

For the past six months Defendants have been pleading with the plaintiffs' counsel to get them to sign off on a Satisfaction of Judgment so that those liens can be removed. None of our efforts have succeeded in getting them to provide a properly executed document.

Given the above, we respectfully request that the Court order the plaintiffs to provide a properly executed Satisfaction of Judgment so that we can finally put this case to rest.

We thank the Court for its attention to this matter.

Very truly yours,



Martin E. Restituyo, Esq.

CC: Jeanne Mirer, Esq.

Not later than **Wednesday, October 31, 2024**, Plaintiffs must either (1) file a proposed satisfaction of judgment that corrects the errors the Clerk's Office identified with respect to the version they filed on June 14, 2024 (Dkt. 259), or (2) file a letter explaining why they are unwilling to execute a proposed full satisfaction of judgment.

SO ORDERED.

 10/24/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE